

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

ROBERT T. BROCKMAN, §
§
Plaintiff, §
§
v. § Civil Action No. 4:22-cv-00202-GCH
§
§
UNITED STATES OF AMERICA, §
§
Defendant. §

August 12, 2022 DECLARATION OF KATHRYN KENEALLY

I, Kathryn Keneally, declare as follows:

1. I am a member of the bar of the State of New York. I am a partner of the law firm Jones Day, counsel for Plaintiff Robert T. Brockman. I make this Declaration in support of Plaintiff Robert T. Brockman's Third Supplemental Memorandum in Support of Motion for Determination on Complaint for Judicial Review and Abatement of Jeopardy Assessment.

2. Attached hereto as Exhibit A is a copy of an Internal Revenue Service Account Transcript for Robert T. Brockman's Form 1040 for his tax period ending December 31, 2004. This exhibit attached hereto has been redacted in compliance with Federal Rule of Civil Procedure 5.2.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in New York, New York on August 12, 2022.

/s/ Kathryn Keneally
Kathryn Keneally

Exhibit A



This Product Contains Sensitive Taxpayer Data

Account Transcript

Request Date 08 05 2022
Response Date: 08-05-2022
Tracking Number [REDACTED]

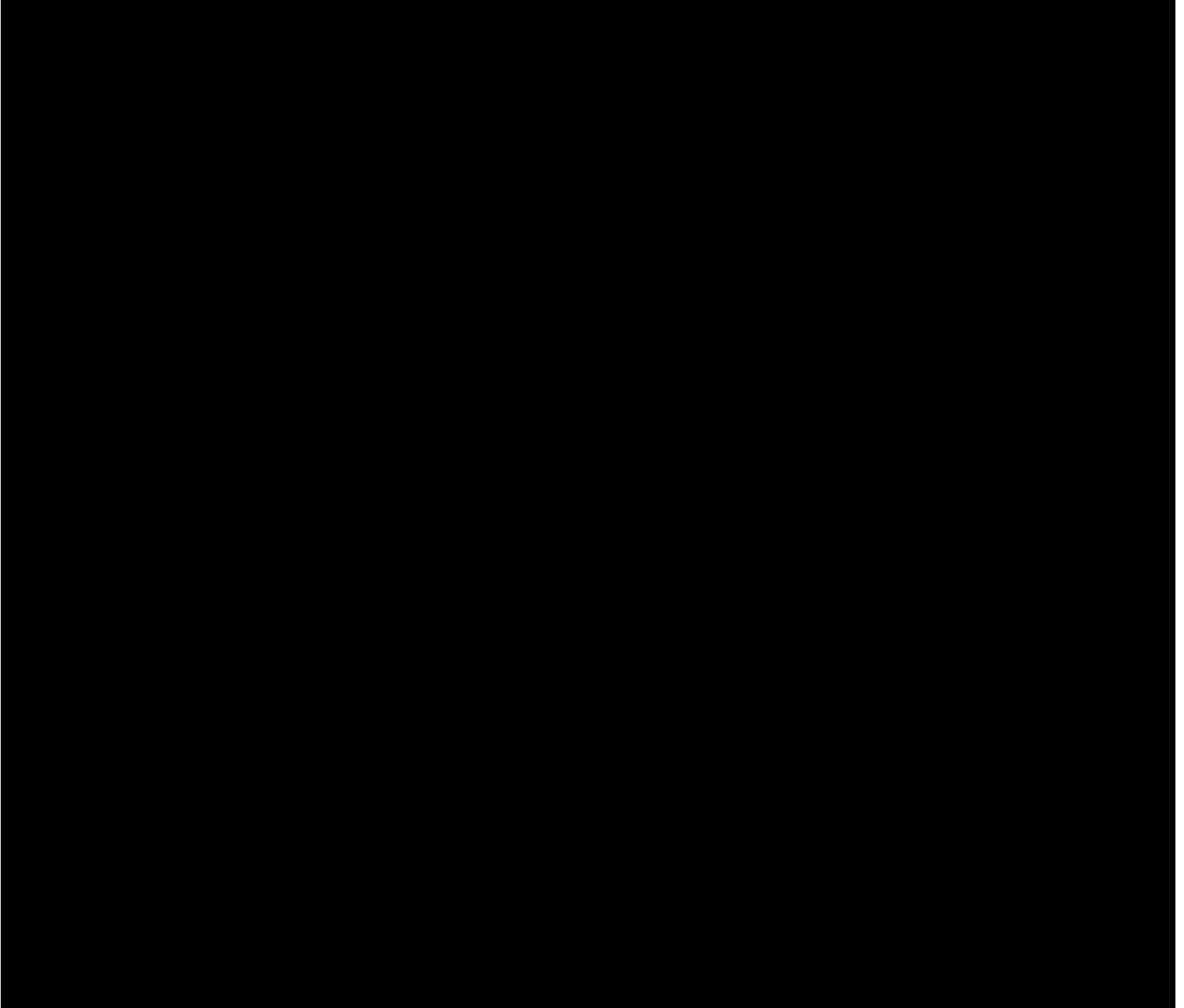
FORM NUMBER: 1040

TAX PERIOD: Dec. 31, 2004

TAXPAYER IDENTIFICATION NUMBER: [REDACTED]

SPOUSE TAXPAYER IDENTIFICATION NUMBER: [REDACTED]

ROBE T BROC



670 Payment 11-17-2021 -\$500,044.98
Levy

670 Payment 11-24-2021 -\$251,061.82
Levy

670 Payment 12-08-2021 -\$1,998,402.54
Levy

670 Payment 12-08-2021 -\$46,462.18
Levy

670 Payment 12-15-2021 -\$1,000,041.54
Levy

| | | | |
|-----|-----------------|------------|---------------|
| 670 | Payment Levy | 12-15-2021 | -\$21,500.89 |
| 670 | Payment Levy | 12-22-2021 | -\$45,981.54 |
| 670 | Payment Levy | 12-22-2021 | -\$518,552.14 |
| 670 | Payment Levy | 01-19-2022 | -\$623,432.28 |

| | | | |
|-----|-----------------|------------|---------------|
| 670 | Payment Levy | 02-18-2022 | -\$630,746.27 |
| 670 | Payment Levy | 03-23-2022 | -\$630,746.28 |

| | | | |
|-----|-----------------|------------|------------------|
| 670 | Payment Levy | 04-11-2022 | -\$630,746.28 |
| 670 | Payment Levy | 05-06-2022 | -\$27,020,546.54 |
| 670 | Payment Levy | 05-18-2022 | -\$630,746.27 |
| 670 | Payment Levy | 05-25-2022 | -\$3,332.80 |
| 670 | Payment Levy | 05-26-2022 | -\$169,816.50 |
| 670 | Payment Levy | 06-16-2022 | -\$1,250.17 |
| 670 | Payment Levy | 06-22-2022 | -\$630,746.28 |
| 670 | Payment Levy | 06-23-2022 | -\$3,332.80 |

| | | | |
|-----|-----------------|------------|--------------|
| 670 | Payment Levy | 07 14 2022 | \$16,588 05 |
| 670 | Payment Levy | 07 19 2022 | \$630,746 28 |
| 670 | Payment Levy | 07 26 2022 | \$3,332 80 |

This Product Contains Sensitive Taxpayer Data